

FILED  
Clerk  
District Court

MAR - 4 2008

1 STEPHEN J. NUTTING, ESQ.  
2 Post Office Box 5093  
3 Saipan, MP 96950  
Telephone: (670) 234-6891  
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For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

4 Attorney for Defendant Han Nam Corporation

5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE  
7 NORTHERN MARIANA ISLANDS

8 ZHAI LAN JIANG,

CIVIL ACTION NO. CV-07-0035

9 Plaintiff,

10 DEFENDANT'S RESPONSE TO PLAINTIFF'S  
11 FIRST SET OF INTERROGATORIES

12 -v-

13 HAN NAM CORPORATION,

14 Defendant.

15 COMES NOW the defendant Han Nam Corporation to respond to Plaintiff's First Set of

16 Interrogatories as follows:

17

18 **INTERROGATORY NUMBER 1:** Please state the total number of EMPLOYEES

19 EMPLOYED by YOU on the following dates:

20

21 a) December 8, 2004;  
22 b) November 16, 2007; and  
23 c) The date of YOUR response to these Interrogatories.

24

25 **Response:**

26 a) Approximately 22 see exhibit 1.  
27 b) Approximately 20 see exhibit 2.  
28 c) Approximately 20 see exhibit 3.

1 **INTERROGATORY NUMBER 2:** Please IDENTIFY all PERSONS, regardless of job title  
2 or category, who have become pregnant while EMPLOYED by YOU.

3 **Response:**

4 1) Carol Lizama  
5 Tun Saldon Road, San Antonio  
6 Saipan, MP 96950

7 Tel: 235-0950

8 2) Mary Ann Mercado  
9 Address Unknown  
10 Last Known Tel: 235-8570

11 3) Zhai Lan Jiang  
12 Address and Telephone # Unknown

13  
14  
15 **INTERROGATORY NUMBER 3:** Please IDENTIFY all PERSONS IDENTIFIED by YOU  
16 in response to Interrogatory Number 2 who are no longer EMPLOYED by YOU and state: (a) the  
17 date of their separation from EMPLOYMENT; (b) the reason(s) for their separation from  
18 EMPLOYMENT; and (c) the current whereabouts of all such PERSONS.

19  
20 **Response:**

21 1) Carol Lizama remains employed by Han Nam

22 2) Mary Ann Mercado transferred to another employer. She remains on Saipan  
23 and can be reached at the above listed number.

24 3) Zhai Lan Jiang abandoned her employment on December, 2004. The reason for  
25 the abandonment of her employment is unknown. Her present whereabouts are  
26 unknown.

1 **INTERROGATORY NUMBER 4:** Please DESCRIBE IN DETAIL all of the  
2 ACCOMMODATIONS YOU made for any PERSON IDENTIFIED in Interrogatory Number 2  
3 above which ACCOMMODATIONS, if any, were made by YOU when the PERSON was pregnant  
4 while EMPLOYED by you.

5 **Response:** Pregnant employee were given light duty tasks which did not involve lifting or  
6 strenuous physical activity. They were allowed to rest as necessary and given leave when they did  
7 not feel well enough to come to work.

8  
9  
10 **INTERROGATORY NUMBER 5:** Please DESCRIBE IN DETAIL all of the  
11 ACCOMMODATIONS YOU made for PLAINTIFF when she became pregnant while  
12 EMPLOYED by YOU.

13  
14 **Response:** Plaintiff was given light duty tasks which did not involve lifting or strenuous  
15 physical activity. She was allowed to rest as necessary and given leave when she did not feel well  
16 enough to come to work.

17  
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20 **INTERROGATORY NUMBER 6:** Please DESCRIBE IN DETAIL why YOU contend that  
21 PLAINTIFF did not adequately perform her job with YOU as she alleged in ¶ 27 of her Complaint  
22 filed on November 16, 2007.

23  
24  
25 **Response:** After being notified that her contact would not be renewed, Plaintiff  
26 abandoned her employment, did not return to work, and failed to complete her contract with  
27 plaintiff.

1  
2 **INTERROGATORY NUMBER 7:** To the extent not included in YOUR Response above,  
3 please STATE ANY AND ALL FACTS that support YOUR contention that PLAINTIFF did not  
4 adequately perform her job with YOU as she alleged in ¶ 27 of her Complaint filed on November  
5 16, 2007.

6  
7 **Response:** See Answer to Interrogatory No. 6.  
8  
9

10 **INTERROGATORY NUMBER 8:** Please state ANY AND ALL FACTS that led to YOUR  
11 decision not to renew PLAINTIFF'S EMPLOYMENT with YOU on January 3, 2005.

12  
13 **Response:** Han Nam operates a large market/department store on the southern end of  
14 Saipan. The market has been in operation since 1996. Sometime in 2001, Han Nam decided to  
15 expand its retail operations to include clothing and other garments. Ms. Jiang was hired to work  
16 in the Garment Section and was retained to make alterations and repairs to garments that were  
17 sold from the premises. Because the apparel division was not profitable, Han Nam decided to  
18 discontinue this line of operation in 2004. At that time, there were two employees working in  
19 the apparel department, they were both promptly notified of this decision. One of the  
20 employees transferred to a new employer, and the second was Ms. Jiang. Because of her  
21 pregnancy, Han Nam offered to extend her contract temporarily to allow her to find work.  
22 Rather than accept this proposal, Ms. Jiang chose to abandon her employment and to pursue a  
23 claim for discrimination with the EEOC.  
24  
25

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28 **INTERROGATORY NUMBER 9:** Please IDENTIFY all EMPLOYEES  
EMPLOYED by YOU after December 28, 2004 that were not EMPLOYED by YOU on or before

1 December 8, 2004 and provided: (a) the date of hire of each such person EMPLOYED, (b) the  
2 nationality of each such person EMPLOYED, and (c) a job description of the actual job or jobs  
3 performed for each such person while EMPLOYED by YOU.

4  
5 **Response:** Objection request is overly broad, vague and burdensome. Notwithstanding this  
6 objection please see the list of employees attached as Exhibit 4 which lists the employees their job  
7 category and citizenship and the approximate date of hire.

8  
9  
10 **INTERROGATORY NUMBER 10:** Please DESCRIBE IN DETAIL all of the various job  
11 duties and responsibilities of PLAINTIFF while EMPLOYED by YOU.

12  
13 **Response:** Plaintiff initially was hired to work in the garment section of the Han Nam  
14 Market. She performed fittings and alterations of the garments. She sometimes worked as a  
15 sales clerk and cashier and after the garment section was closed she assisted in restocking,  
16 acted as a cashier and performed general clean up.

17  
18  
19 **INTERROGATORY NUMBER 11:** Please state ANY AND ALL FACTS that support YOUR  
20 first affirmative defense that PLAINTIFF's claims, or any of them, fail to state a claim upon which  
21 relief can be granted as alleged in YOUR Answer to PLAINTIFF's Complaint filed on December  
22 5, 2007.

23  
24 **Response:** Plaintiff's complaint fails to allege any facts or incidents which support a  
25 showing of any discriminatory animus on the basis of sex or race as alleged.

1       **INTERROGATORY NUMBER 12:** Please state ANY AND ALL FACTS that support YOUR  
2 second affirmative defense that PLAINTIFF “voluntarily abandoned her employment with Han  
3 Nam in breach of her employment contract” as alleged in YOUR Answer to PLAINTIFF’s  
4 Complaint filed on December 5, 2007.  
5

6           **Response:** After being notified of Han Nam’s intent to close the garment section of its  
7 operations, and the decision not to renew her contract, plaintiff voluntarily abandoned her  
8 employment and did not return to work at Han Nam in breach of her employment contract.  
9

10

11       **INTERROGATORY NUMBER 13:** Please state ANY AND ALL FACTS that support YOUR  
12 third affirmative defense that “neither gender nor ethnicity played any role in the decision not to  
13 renew plaintiff’s employment contract with Han Nam” as alleged in YOUR Answer to  
14 PLAINTIFF’s Complaint filed on December 5, 2007.  
15

16           **Response:** Ms. Jiang was hired to work in the Garment Section and was retained to  
17 make alterations and repairs to garments that were sold from the premises. Because the apparel  
18 division was not profitable, Han Nam decided to discontinue this line of operation in 2004.  
19 The decision not to renew her contract was based solely on a reasonable business decision to  
20 terminate an unsuccessful branch of the business operations. Issues related to plaintiff’s  
21 pregnancy, gender, race or other discriminatory animus took no part in Han Nam’s decision not  
22 to renew plaintiff’s employment contract. Han Nam had other employees who became  
23 pregnant and remained employees of Han Nam. Likewise, Han Nam employed other  
24 individuals of Chinese citizenship and ancestry and plaintiffs original complaint to the EEOC  
25 and then to the United States District Court is without factual foundation.  
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28

1 **INTERROGATORY NUMBER 14:** Please state ANY AND ALL FACTS that support YOUR  
2 fourth affirmative defense that PLAINTIFF has unclean hands as alleged in YOUR Answer to  
3 PLAINTIFF'S Complaint filed on December 5, 2007.

4  
5 **Response:** Plaintiff made false accusations to the Equal Employment Opportunity  
6 Commission relative to her allegations of gender and race based discrimination. Plaintiff  
7 claimed that she was the only person of Chinese ethnicity who was employed by Han Nam,  
8 which was a statement which plaintiff knew to be false at the time she made it. Plaintiff has no  
9 valid claim of discrimination against Han Nam, but seeks to use such claims to extort money  
10 from Han Nam.

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14 **INTERROGATORY NUMBER 15:** Please state ANY AND ALL FACTS that support YOUR  
15 fifth affirmative defense that "Han Nam at all relevant times acted fairly, reasonably, justly and in  
16 good faith with respect to the plaintiff and in all dealings with its employees" as alleged in YOUR  
17 Answer to PLAINTIFF's Complaint filed on December 5, 2007.

18  
19 **Response:** See Answer to Interrogatory No. 8.

20  
21  
22 **INTERROGATORY NUMBER 16:** Please state ANY AND ALL FACTS and other  
23 "discoverable information" that YOU believe is within the knowledge of Mr. Jun Soo Park (an  
24 individual identified in YOUR Rule 26(a)(1) disclosures) that is in any way RELATED TO this  
25 LAWSUIT and/or PLAINTIFF's claims herein.

26  
27 **Response:** Objection. Interrogatory is overly vague. Without waiving the objection,  
28 defendants incorporate the answer to Interrogatory 8 and 13.

1 **INTERROGATORY NUMBER 17:** Please state ANY AND ALL FACTS and other  
2 "discoverable information" that YOU believe is within the knowledge of Mrs. Kim Yang Park (an  
3 individual identified in YOUR Rule 26(a)(1) disclosures) that is in any way RELATED TO this  
4 LAWSUIT and/or PLAINTIFF's claims herein.

5       **Response:** Objection. Interrogatory is overly vague. Without waiving the objection,  
6 defendants incorporate the answer to Interrogatory 8 and 13.

7  
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9  
10 **INTERROGATORY NUMBER 18:** Please IDENTIFY any and all "Employees of Han Nam  
11 Market" (as identified in YOUR Rule 26(a)(1) disclosures) that have discoverable information that  
12 is in any way RELATED TO this LAWSUIT and/or PLAINTIFF's claims herein.

13       **Response:** Objection, without interviewing each and every employee of Han Nam Market  
14 employed during the period plaintiff's employment it is impossible to determine whether they have  
15 discoverable information or not. Without waiving this objection, plaintiff incorporates exhibit 1  
16 in this response.

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19  
20 **INTERROGATORY NUMBER 19:** For each PERSON IDENTIFIED by YOU in response to  
21 Interrogatory Number 18, please state ANY AND ALL FACTS and other "discoverable  
22 information" that YOU believe is within the knowledge of each such PERSON that is in any way  
23 RELATED TO this LAWSUIT and/or PLAINTIFF's claims herein.

24  
25       **Response:** Objection. Interrogatory is overly vague, ambiguous and unduly burdensome.  
26 Defendant is not obligated to interview or take statements from all of its employees to determine  
27 what knowledge they may have which might be "in any way RELATED TO this LAWSUIT

1 and/or PLAINTIFF'S claims. Notwithstanding this objection defendant incorporates its answers  
2 as set forth in the responses to interrogatories no.s 4, 5, 6, 8, 10, 12, and 13.  
3  
4

5 **INTERROGATORY NUMBER 20:** Please DESCRIBE IN DETAIL the relationship between  
6 YOU and Vienna Corporation.  
7  
8

9 **Response:** Han Nam Corporation are independent corporations but which have some  
10 common shareholders and directors. See the annual reports attached as Exhibits 5 and 6.  
11  
12

13 **INTERROGATORY NUMBER 21:** Please IDENTIFY the PERSON that translated for Mrs.  
14 Park during her December 8, 2004 discussion with PLAINTIFF wherein PLAINTIFF was told that  
15 she was not being renewed.  
16  
17

18 **Response:** At the present time the name of the translator is unknown. Defendant  
19 believes that she is presently residing in China.  
20  
21

22 Dated this 29<sup>th</sup> day of February, 2008.  
23  
24

25 The objections herein are the objections of the undersigned attorney and this validation of  
26 the objections is adopted for each Interrogatory herein.  
27  
28

29  
30 

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31 /s/  
32 Stephen J. Nutting  
33 Attorney for Defendant  
34  
35

1 I swear that the answers given herein to the interrogatories are true to the best of my  
2 knowledge and belief.  
3  
4

5 \_\_\_\_\_ /s/  
6 Paek, Hyun Ho  
7 Manager, Han Nam Market  
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**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S FOR DECEMBER 2004**

Name of Employee's	Categories	Citizenship
1. Palacios, Vincent	Assistant Manager	US CNMI
2. Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3. Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4. Zaman, Kamruz	Store Clerk	Bangladesh(Non-Alien IR)
5. Soriano, Servillana	Commercial Cleaner	Filipino
6. Baliton, Myrna	Cashier	Filipino
7. Alcaide, Gil	Building Maintenance Repairer	Filipino
8. Cho, Myung Hee	Manager	Korean
9. Kim, Yang	Business Permit IR	Korean
10. Limoico, Jeffry	Butcher	Filipino
11. Gascon, Julieta	Commercial Cleaner	Filipino
12. San Nicolas, Frances	Cashier	US CNMI
13. Lee, Kwoan Hyung	Sales Manager	Korean
14. Jiang, Zhai Lan	Dress Maker	Chinese
15. Notario, Nelly	Sales Person	Filipino
16. Delima, Nestor	Meat Cutter	Filipino
17. Keller, Gayson Max	Store Clerk	US CNMI
18. Abigania, Lester	Store Clerk	US CNMI
19. Cui, Hai Jin	Commercial Cleaner	Chinese
20. Piao, Shizhu	Supervisor Sales	Chinese
21. Lactao, Eric	Sales Representative	Filipino
22. Sundiam, Pee Jay	Commercial Cleaner	Filipino

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF NOVEMBER 16, 2007**

Name of Employee's	Categories	Citizenship
1. Palacios, Vincent	Assistant Manager	US CNMI
2. Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3. Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4. Soriano, Servillana	Commercial Cleaner	Filipino
5. Song, Keum Rye	Accountant	Korean
6. Alcaide, Gil	Building Maintenance Repairer	Filipino
7. Jin, Cheng Huan	Sales Supervisor	Chinese
8. Kim, Yang	Business Permit IR	Korean
9. Limoico, Jeffry	Butcher	Filipino
10. Gascon, Julieta	Commercial Cleaner	Filipino
11. San Nicolas, Frances	Cashier	US CNMI
12. Lee, Kwoan Hyung	Sales Manager	Korean
13. Sundiam, Amelita	Commercial Cleaner	Filipino
14. Notario, Nelly	Sales Person	Filipino
15. Santos, Jennifer	Cashier	US CNMI
16. Aldan, Judith	Cashier	US CNMI
17. Abigania, Llyod	Store Clerk	US CNMI
18. Chan, Bryan	Store Clerk	US CNMI
19. Lactao, Eric	Sales Representative	Filipino
20. Sundiam, Pee Jay	Commercial Cleaner	Filipino

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF JANUARY 31, 2008**

Name of Employee's	Categories	Citizenship
1. Palacios, Vincent	Assistant Manager	US CNMI
2. Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3. Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4. Soriano, Servillana	Commercial Cleaner	Filipino
5. Song, Keum Rye	Accountant	Korean
6. Alcaide, Gil	Building Maintenance Repairer	Filipino
7. Jin, Cheng Huan	Sales Supervisor	Chinese
8. Kim, Yang	Business Permit IR	Korean
9. Limoico, Jeffry	Butcher	Filipino
10. Gascon, Julieta	Commercial Cleaner	Filipino
11. San Nicolas, Frances	Cashier	US CNMI
12. Lee, Kwoan Hyung	Sales Manager	Korean
13. Sundiam, Amelita	Commercial Cleaner	Filipino
14. Notario, Nelly	Sales Person	Filipino
15. Koshiba, Lynette	Cashier	US CNMI
16. Aldan, Judith	Cashier	US CNMI
17. Abigania, Llyod	Store Clerk	US CNMI
18. Chan, Bryan	Store Clerk	US CNMI
19. Lactao, Eric	Sales Representative	Filipino
20. Suda, Seriko	Store Clerk	US CNMI

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF 01/05 TO 01/08**

*New Hire.*

Name of Employee's	Categories	Citizenship	
1. Song, Keum Rye	Accountant	Korean	Feb 2005
2. Jin, Cheng Huan	Sales Supervisor	Chinese	Dec. 2006
3. Cabrera, Andrea Dee	Cashier	US CNMI	June, 2005
4. Taitano, Michael	Store Clerk	US CNMI	Oct, 2005
5. Taisacan, Mario	Sore Clerk	US CNMI	Nov. 2005
6. Santos, Jennifer	Cashier	US CNMI	Nov. 2007
7. Hocket Jadine	Cashier	US CNMI	Nov. 2006
8. Sundiam, Amelita	Commercial Cleaner	Filipino	April, 2005
9. Park, Gyu Ha	General Manager	Korean	June 2006
10. Koshiba, Lynette	Cashier	US CNMI	Dec. 2007
11. Aldan, Judith	Cashier	US CNMI	June 2006
12. Abigania, Llyod	Store Clerk	US CNMI	Oct. 2006
13. Chan, Bryan	Store Clerk	US CNMI	Sept. 2007
14. Aldan, Edith	Cashier	US CNMI	March 2007
15. Suda, Seriko	Store Clerk	US CNMI	Jan. 2008

EXHIBIT 4

## ANNUAL CORPORATION REPORT

**Filing Fee \$50.00 / Make Check Payable to: CNMI TREASURER  
File Original and Two Copies**

**FILING: THE INITIAL REPORT MUST BE FILED WITHIN 60 DAYS OF INCORPORATION. ANNUAL REPORT MUST BE FILED ON OR BEFORE MARCH 1<sup>ST</sup> OF EACH YEAR.**

FILE WITH: REGISTRAR OF CORPORATIONS  
Department of Commerce  
2<sup>nd</sup> Floor, Joeten Dandan Building Room 27  
Caller Box 10007  
Saipan, MP 96950

INITIAL REPORT: \_\_\_\_\_ REPORT FOR THE YEAR \_\_\_\_\_  
CHECK ONE:  Domestic Corporation  Foreign Corporation

2007 JUN 25 AM 8:30

AlPua

#1019119

Name, Mailing Address & Telephone No. of Corporation: (Attach map showing location if address is only a P. O. Box)

HAN NAM CORPORATION  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950

Telephone Number: 288-9290  
LOCATION: KOBLEVILLE

Name, Mailing Address & Telephone No. of Registered Agent: (Attach Map showing location if address is only a P. O. Box)

KIM, YANG  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950

Telephone Number: 288-9290

**LIST OF DIRECTORS:**

<u>Name</u>	<u>Nationality</u>	<u>Address</u>
PARK, JUN SOO	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950
KIM, YOUNG JONG	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950
KIM, YANG	KOREAN	PMB 385 P.O.BOX 10001 SATPAN MP 96950

**LIST OF OFFICERS:**

<u>Name</u>	<u>Position</u>	<u>Nationality</u>	<u>Address</u>
PARK, JUN SOO	PRESIDENT/TREAS.	KOREAN	SAME AS ABOVE
KIM, YOUNG JONG	VICE PRESIDENT	KOREAN	SAME AS ABOVE
KIM, YANG	SECRETARY	KOREAN	SAME AS ABOVE

**DESCRIPTION OF BUSINESS ACTIVITIES - List all lines of business:**

RETAIL CLOTHING STORE, WHOLESALE GENERAL MERCHANDISE, RETAIL GENERAL MERCHANDISE, IMPORT/EXPORT (EXCEPT GARMENTS) MANUFACTURE.

**STOCK ISSUED AND OUTSTANDING:**

<u>Number of Shares</u>	<u>Class of Shares</u>	<u>Amount Paid for Shares</u>	
NAME OF SHAREHOLDERS	IMMIGRATION STATUS	NATIONALITY	NUMBER OF SHARES HELD
350 SHARES	COMMON STOCK	\$350,000.00	
PARK, JUN SOO	BUSINESS	KOREAN	250,000SH
KIM, YOUNG JONG	STAYING IN KOREA	KOREAN	50,000 SH
KIM, YANG	I.R.	KOREAN	50,000 SH

Signature:

100

Date: 6/1/07

PARK, JUN SOO/PRESIDENT  
PRINT NAME & TITLE OF PERSON SIGNING  
(Must be Director or Officer of the Corporation.)

EXHIBIT 5

DEPT. OF COMMERCE

3-10 p  
SEP 04 2007**ANNUAL CORPORATION REPORT**Filing Fee \$50.00 / Make Check Payable to: CNMI TREASURER  
File Original and Two Copies**FILING: THE INITIAL REPORT MUST BE FILED WITHIN 60 DAYS OF INCORPORATION.  
ANNUAL REPORT MUST BE FILED ON OR BEFORE MARCH 1<sup>ST</sup> OF EACH YEAR.**FILE WITH: **REGISTRAR OF CORPORATIONS**  
Department of Commerce  
2<sup>nd</sup> Floor, Joeten Dandan Building Room 27  
Caller Box 10007  
Saipan, MP 96950Registar of Corporations  
Commonwealth of the  
Northern Mariana IslandsINITIAL REPORT: **REPORT FOR THE YEAR 2006**  
CHECK ONE:  Domestic Corporation  Foreign CorporationName, Mailing Address & Telephone No. of Corporation: **(Attach map showing location if address is only a P. O. Box)**VIENNA CORPORATION  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950Telephone Number: **256-8949**  
LOCATION: GARAPANName, Mailing Address & Telephone No. of Registered Agent: **(Attach Map showing location if address is only a P. O. Box)**PARK, JUN SOO  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950Telephone Number: **288-9290****LIST OF DIRECTORS:**

<u>Name</u>	<u>Nationality</u>	<u>Address</u>
PARK, JUN SOO	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950
KIM, YANG	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950

**LIST OF OFFICERS:**

<u>Name</u>	<u>Position</u>	<u>Nationality</u>	<u>Address</u>
PARK, JUN SOO	PRESIDENT/TREASURER	KOREAN	SAME AS ABOVE
KIM, YANG	VICE-PRESIDENT/SECRETARY	KOREAN	SAME AS ABOVE

**DESCRIPTION OF BUSINESS ACTIVITIES - List all lines of business:**

RETAIL GENERAL MERCHANDISE/WHOLESALE GENERAL MERCHANDISE

**STOCK ISSUED AND OUTSTANDING:**

<u>Number of Shares</u>	<u>Class of Shares</u>	<u>Amount Paid for Shares</u>	
2,500 SH	COMMON STOCK	US\$250,000.00	
NAME OF SHAREHOLDERS	IMMIGRATION STATUS	NATIONALITY	NUMBER OF SHARES HELD
PARK, JUN SOO	BUSINESS	KOREAN	2,000 SH
KIM, YANG	I.R.	KOREAN	500 SH

Signature:

PARK, JUN SOO /PRESIDENT  
PRINT NAME & TITLE OF PERSON SIGNING  
(Must be Director or Officer of the Corporation.)Date: 09/04/07

EXHIBIT 6